

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ANYWHERECOMMERCE, INC.
and BBPOS LIMITED,**

Plaintiffs,

v.

**INGENICO INC., INGENICO CORP. and
INGENICO GROUP, SA,**

Defendants.

**CIVIL ACTION NO.
1:19-cv-11457-IT**

**JOINT MOTION FOR RULE 502(d) ORDER AND
STIPULATION AND PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Rule 502(d) of the Federal Rules of Evidence, the parties in the above-captioned litigation respectfully move this Court for entry of Stipulated Rule 502(d) Order attached hereto as Exhibit A as well as the Stipulation and [Proposed] Protective Order (the “Protective Order”) attached hereto as Exhibit B. As grounds for this Joint Motion, the parties state that private, corporate, proprietary, and employee information protected from disclosure is at issue in this case and is being sought by the parties in discovery. Entry of the attached proposed Protective Order is necessary to maintain the confidentiality of such information.

Dated: February 27, 2020

Respectfully Submitted,

Plaintiffs
AnywhereCommerce, Inc.
and BBPOS Limited,

By their attorneys,

/s/ Jonathon D. Friedmann

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Defendants
Ingenico Inc., Ingenico Corp. and Ingenico
Group SAS,

By their attorneys,

/s/ John A. Tarantino

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